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**From:** Biscoe, Melanie [Biscoe.Melanie@epa.gov]  
**Sent:** 10/13/2022 8:57:02 PM  
**To:** Arrington, Linda [Arrington.Linda@epa.gov]; Britton, Cathryn [Britton.Cathryn@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]; Sherman, Kelly [Sherman.Kelly@epa.gov]  
**CC:** Schroeder, Carolyn [Schroeder.Carolyn@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Kiely, Timothy [Kiely.Timothy@epa.gov]; Perry, Tracy [Perry.Tracy@epa.gov]  
**Subject:** FW: EPA Internal - By 2 PM Mon, Review ESA Weekly FIFRA Mitigation Path Forward  
**Attachments:** 10-12-22 ESA Weekly Briefing - Cut Points and Follow-ups.docx

PRD BCs,

See email below and attachment for an update on the Baseline FIFRA Mitigation since yesterday's briefing of Jake and the DDs.

As you can see, the Q4 PID schedule will likely be shifting for a third time. Elissa or I will keep you updated on how things proceed on Tuesday and what that means for Q4 timing.

In the meantime, I'll shortly send out to PRD-All the Baseline FIFRA Mitigation Guidance document with identifying comments on where we expect changes to be made (will be consistent with the attachment here). That way the CRMs and teams can see basically what they need to do, acknowledging that there are likely to be changes to the VFS mitigation and associated label language.

This is most important for Q4 PIDs, but Q1 PIDs I know are already in the works so it would be good for those teams to familiarize themselves with the mitigation as well. Please keep in mind that these measures are not intended to address all eco risk, and they may not obviate the need for chemical-specific measures like rate reductions or changes to application timing, etc.

Best Regards,

*Melanie L. Biscoe*

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**From:** Biscoe, Melanie  
**Sent:** Thursday, October 13, 2022 4:48 PM  
**To:** Li, Jake <Li.Jake@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>; Garber, Kristina <Garber.Kristina@epa.gov>  
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**Subject:** EPA Internal - By 2 PM Mon, Review ESA Weekly FIFRA Mitigation Path Forward

ESA Weekly Participants and FIFRA Generic Mitigation Workgroup,

Attached is a summary of next steps for each mitigation/advisory measure presented yesterday. Please review – **if anything needs to be changed on this path forward, please let me know by 2 PM Monday.**

Here are a few updates since yesterday's meeting:

- EFED IO has a new recommendation for aquatic runoff VFS, and that the new recommendation as well as implications for soil-sorbed VFS and timing implications will be discussed at a Monday 2 PM meeting (DDs and key staff) after EFED has a chance to conduct a little more research.
- TM/MBC has seed treatment uses, and DCNA has an on-farm potato seed piece treatment use.
- In a meeting earlier today, OPMP indicated that USDA does not want HEL referenced on EPA labels. This can easily be taken out of the soil-sorbed pesticide mitigation (essentially, the language reverts back to pyrethroid ID label language).

Best Regards,

*Melanie L. Biscoe*

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